

**To:** Chang, Andy[chang.andy@epa.gov]  
**Cc:** Thrift, Mike[thrift.mike@epa.gov]  
**From:** Meyer, Jonathan  
**Sent:** Mon 3/7/2016 6:14:59 PM  
**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

Exemption 5:  
Attorney-Client

**From:** Thrift, Mike  
**Sent:** Monday, March 07, 2016 11:08 AM  
**To:** Chang, Andy <chang.andy@epa.gov>; Meyer, Jonathan <Meyer.Jonathan@epa.gov>  
**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

**From:** Chang, Andy  
**Sent:** Monday, March 07, 2016 8:58 AM  
**To:** Thrift, Mike <thrift.mike@epa.gov>; Meyer, Jonathan <Meyer.Jonathan@epa.gov>  
**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

Exemption 5:  
Attorney-Client

Tragedy. Here's the info, which I obtained 2<sup>nd</sup> hand (Jon, I saw that you'd be able to make it).

Background email for the call:

OCIR HQ got a request from Sen. McCaskill's DC office for a phone call to discuss the SO2 designation for Franklin County, MO. I believe the public comment period is currently open on EPA's proposed decision to classify Franklin County as non-attainment, as opposed to following the state proposed designation as unclassifiable. The staffer would like to hear about EPA's reasoning around the designation and why we relied on modeling instead of the (new?) air

monitors in the area to make the designation. I believe the state looked to the monitors in making their unclassifiable recommendation.

He'd be interested in having a call late this week or early next week. Let me know who you think would be best to have on the line and I can coordinate with them about the timing.

Thanks,

Matthew

Some background that the staffer has perhaps seen or been pointed to by constituent groups:

<http://news.stlpublicradio.org/post/preliminary-epa-designation-says-labadie-coal-plant-exceeds-federal-pollution-standard>

[https://www3.epa.gov/airquality/sulfurdioxide/designations/round2/07\\_MO\\_resp.pdf](https://www3.epa.gov/airquality/sulfurdioxide/designations/round2/07_MO_resp.pdf)

<http://news.stlpublicradio.org/post/missouri-regulators-unable-say-whether-air-near-amerens-labadie-power-plant-safe-breathe>

Summary excerpt from the MO submission to EPA on 9/24/2015:

Ameren Labadie Energy Center

For the area surrounding the Ameren Labadie Energy Center, the Air Program recommends an

unclassifiable area designation. Our recommendation is based on varying modeling results

showing both violations and no violations of the SO<sub>2</sub> standard around Labadie, depending on the

options and inputs chosen. In addition to these modeling evaluations of Labadie, preliminary data

from new ambient SO<sub>2</sub> monitors near the plant is available. Since the start of operation in April

2015, these monitors have been measuring SO<sub>2</sub> concentrations below the 1-hour SO<sub>2</sub> standard of

75 ppb. A new state statute, Section 643.650, RSMo, (SB 445 and HB 92 from the 2015 legislative

session), became effective August 28, 2015. Section 643.650, RSMo, directs the department to

consider SO<sub>2</sub> monitoring data for sources that choose to monitor to characterize their air quality.

Though the dataset from Labadie's new SO<sub>2</sub> monitors is limited, we must consider it, consistent

with state law. Because it cannot be determined based on available information whether the area is

or is not meeting the 1-hour SO<sub>2</sub> standard, the Air Program recommends an unclassifiable

designation for the area near Labadie. In addition to the Air Program's modeling evaluation and

review of available SO2 monitoring data, we are including modeling analyses from Ameren

Missouri and Washington University Environmental Law Clinic that we received during the public

comment period as further support for the unclassifiable designation around Labadie. These

analyses are in Appendix G.

Andy Chang, M.S.

Environmental Engineer || U.S. EPA Office of Air Quality Planning & Standards

C545-A || 919-541-2416 (office)

**From:** Thrift, Mike

**Sent:** Monday, March 07, 2016 11:55 AM

**To:** Chang, Andy <[chang.andy@epa.gov](mailto:chang.andy@epa.gov)>; Meyer, Jonathan <[Meyer.Jonathan@epa.gov](mailto:Meyer.Jonathan@epa.gov)>

**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

Andy--

Neither of us knew about this until this morning, and I have another call at that time [REDACTED]

Exemption 5:  
Attorney-Client

**From:** Chang, Andy  
**Sent:** Monday, March 07, 2016 8:53 AM  
**To:** Thrift, Mike <[thrift.mike@epa.gov](mailto:thrift.mike@epa.gov)>; Meyer, Jonathan <[Meyer.Jonathan@epa.gov](mailto:Meyer.Jonathan@epa.gov)>  
**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

Good catch, Mike.

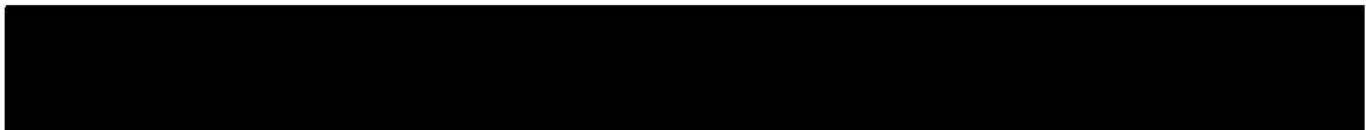
Our TAD notes that allowables can be used if intended to show attainment (e.g., facility adopts a new hourly limit). Were the two of you invited to today's 12:30 eastern pre-meeting call with OCIR and Region 7 (no staff here were invited, but I'll be listening in)? I think Scott intended to use the time to walk through this pager and correct any last minute deficiencies so we're on the same page for the actual meeting with McCaskill's staff (no clue when that is).

Andy Chang, M.S.

Environmental Engineer || U.S. EPA Office of Air Quality Planning & Standards

C545-A || 919-541-2416 (office)

**From:** Thrift, Mike  
**Sent:** Monday, March 07, 2016 11:49 AM  
**To:** Peter, David <[peter.david@epa.gov](mailto:peter.david@epa.gov)>; Hawes, Todd <[Hawes.Todd@epa.gov](mailto:Hawes.Todd@epa.gov)>; Chang, Andy <[chang.andy@epa.gov](mailto:chang.andy@epa.gov)>; Bridgers, George <[Bridgers.George@epa.gov](mailto:Bridgers.George@epa.gov)>; Thurman, James <[Thurman.James@epa.gov](mailto:Thurman.James@epa.gov)>; Solomon, Douglas <[Solomon.Douglas@epa.gov](mailto:Solomon.Douglas@epa.gov)>  
**Cc:** Meyer, Jonathan <[Meyer.Jonathan@epa.gov](mailto:Meyer.Jonathan@epa.gov)>  
**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie



← Exemption 5:  
Deliberative;  
Attorney Client

Exemption 5:  
Deliberative;  
Attorney-Client

**From:** Peter, David

**Sent:** Monday, March 07, 2016 6:20 AM

**To:** Hawes, Todd <Hawes.Todd@epa.gov>; Chang, Andy <chang.andy@epa.gov>; Bridgers, George <Bridgers.George@epa.gov>; Thurman, James <Thurman.James@epa.gov>; Solomon, Douglas <Solomon.Douglas@epa.gov>; Thrift, Mike <thrift.mike@epa.gov>

**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

Andy – I added a couple of comments. David

**From:** Hawes, Todd

**Sent:** Monday, March 07, 2016 8:06 AM

**To:** Chang, Andy <chang.andy@epa.gov>; Bridgers, George <Bridgers.George@epa.gov>; Thurman, James <Thurman.James@epa.gov>; Solomon, Douglas <Solomon.Douglas@epa.gov>; Peter, David <peter.david@epa.gov>; Thrift, Mike <thrift.mike@epa.gov>

**Subject:** RE: Not time critical: Final review of Pager for Ameren Labadie

Hi Andy – with regard to Scott's comment:

Exemption 5:  
Deliberative;  
Attorney-Client

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Todd Hawes | USEPA | OAQPS/AQAD/Phone (919) 541-5591

**From:** Chang, Andy

**Sent:** Monday, March 07, 2016 7:28 AM

**To:** Bridgers, George <[Bridgers.George@epa.gov](mailto:Bridgers.George@epa.gov)>; Thurman, James <[Thurman.James@epa.gov](mailto:Thurman.James@epa.gov)>; Hawes, Todd <[Hawes.Todd@epa.gov](mailto:Hawes.Todd@epa.gov)>; Solomon, Douglas <[Solomon.Douglas@epa.gov](mailto:Solomon.Douglas@epa.gov)>; Peter, David <[peter.david@epa.gov](mailto:peter.david@epa.gov)>; Thrift, Mike <[thrift.mike@epa.gov](mailto:thrift.mike@epa.gov)>

**Subject:** Not time critical: Final review of Pager for Ameren Labadie

Good morning,

Scott had some small edits and clarifications to the pager that was sent up last Thursday. It is not time critical that we have all the pieces in place by today's 12:30 eastern pre-call with OCIR/Region 7 (still not sure what the final invite list looks like) since any gaps can be filled in then, but if you all have a few moments to spare, Scott wanted to make sure that his edits and messages for an executive level summary wouldn't cause any heartburn.

Thanks!

Andy Chang, M.S.

Environmental Engineer || U.S. EPA Office of Air Quality Planning & Standards

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**From:** Chang, Andy

**Sent:** Thursday, March 03, 2016 11:12 AM

**To:** Bridgers, George <[Bridgers.George@epa.gov](mailto:Bridgers.George@epa.gov)>; Thurman, James <[Thurman.James@epa.gov](mailto:Thurman.James@epa.gov)>; Hawes, Todd <[Hawes.Todd@epa.gov](mailto:Hawes.Todd@epa.gov)>; Solomon, Douglas

<Solomon.Douglas@epa.gov>; Peter, David <peter.david@epa.gov>

**Subject:** SO2 Designations: Pager for Ameren sent to Scott Mathias

Thanks for the speedy turnaround on your review. This is the version that just went to Scott, though it may change prior to Monday's pre-meeting. I know that the pre-meeting has been set up with Region 7 and OAQPS, with an invite list that was quite short (APMs/counterparts and above, and maybe OAQPS/R7 Congressional Liaison staff)

Your names have been implicated of course for the actual meeting with Senator McCaskill's staffer, but date and time tbd.

Thanks again!

Andy Chang, M.S.

Environmental Engineer || U.S. EPA Office of Air Quality Planning & Standards

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**From:** Bridgers, George

**Sent:** Thursday, March 03, 2016 10:11 AM

**To:** Thurman, James <Thurman.James@epa.gov>; Chang, Andy <chang.andy@epa.gov>; Hawes, Todd <Hawes.Todd@epa.gov>; Solomon, Douglas <Solomon.Douglas@epa.gov>; Peter, David <peter.david@epa.gov>

**Subject:** RE: SO2 Designations: Review of Pager for Ameren Labadie

I realize that this response comes after Todd sent some other thoughts that might change the order of some of the information, but I was already in progress on some suggested edits. See the attached word document. Please let me know if we need to rethink some of the phrasing suggestions.



-George

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George M. Bridgers, CPM, Environmental Scientist  
U.S. Environmental Protection Agency  
Office of Air Quality Planning and Standards  
AQAD - Air Quality Modeling Group  
109 TW Alexander Drive  
Room C431B - Mail Drop C439-01  
Research Triangle Park, NC 27711  
Phone: 919-541-5563  
Fax: 919-541-0044

**From:** Thurman, James  
**Sent:** Thursday, March 03, 2016 8:54 AM  
**To:** Chang, Andy <[chang.andy@epa.gov](mailto:chang.andy@epa.gov)>; Hawes, Todd <[Hawes.Todd@epa.gov](mailto:Hawes.Todd@epa.gov)>; Solomon, Douglas <[Solomon.Douglas@epa.gov](mailto:Solomon.Douglas@epa.gov)>; Peter, David <[peter.david@epa.gov](mailto:peter.david@epa.gov)>  
**Cc:** Bridgers, George <[Bridgers.George@epa.gov](mailto:Bridgers.George@epa.gov)>  
**Subject:** RE: SO2 Designations: Review of Pager for Ameren Labadie

Andy,

I am checking with George Bridgers on language in 1.d of points of transaction and the text in 2.b at the end.

James

James A. Thurman, Ph.D.

U.S. EPA/OAQPS/AQAD

Air Quality Modeling Group (C439-01)

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: (919) 541-2703

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Email: [thurman.james@epa.gov](mailto:thurman.james@epa.gov)

**From:** Chang, Andy

**Sent:** Thursday, March 03, 2016 8:46 AM

**To:** Hawes, Todd <[Hawes.Todd@epa.gov](mailto:Hawes.Todd@epa.gov)>; Solomon, Douglas <[Solomon.Douglas@epa.gov](mailto:Solomon.Douglas@epa.gov)>;  
Thurman, James <[Thurman.James@epa.gov](mailto:Thurman.James@epa.gov)>; Peter, David <[peter.david@epa.gov](mailto:peter.david@epa.gov)>

**Subject:** SO2 Designations: Review of Pager for Ameren Labadie

Good morning,

We got pinged for a meeting with Senator McCaskill's staff to discuss the intended nonattainment designation for Franklin County, Missouri (Ameren Labadie). At Scott's request, a pager has been developed with his specified info.

Can you all take a quick look to make sure I've characterized everything correctly? Info was taken from the MO TSD and Sierra Club's letter/compliance report for the facility. Keeping relevant info to a page for this type of shenanigans is harder than I thought it'd be...

Sorry for tight turnaround; we aspire to have something that Scott can tweak by noon eastern today...

Andy Chang, M.S.

Environmental Engineer || U.S. EPA Office of Air Quality Planning & Standards

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